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9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA

11
12 IN RE REQUEST FOR JUDICIAL) No. 25-mc-80172
13 ASSISTANCE FROM THE LAW COURT)
14 BUCHAREST IN BUCHAREST, ROMANIA,) **[PROPOSED] EX PARTE ORDER GRANTING**
15 DJ No.: 189-19-25-4, IN THE MATTER OF) **UNITED STATES' APPLICATION PURSUANT**
16 *CRYPTO.RO V. NITA DUMITRU-DANIEL*) **TO 28 U.S.C. § 1782**
17 _____)
18 _____)
19 _____)
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18 Pending before the Court is an application submitted by the United States pursuant to 28 U.S.C.
19 Section 1782 (the “Application”) concerning a request by the Law Court Bucharest in Bucharest,
20 Romania (“Romanian Court”) for information from Patreon, Inc. (“Patreon”), a company located within
21 the jurisdiction of this Court, issued in connection with a pending judicial proceeding captioned
22 *Crypto.RO v. Nita Dumitru-Daniel*, Ref. No. 23128/3/2022. The United States requests that the Court
23 appoint Michael A. Keough, Assistant United States Attorney (“AUSA”), as Commissioner, and
24 authorize AUSA Keough to serve Patreon with a subpoena in accordance with the terms and conditions
25 set forth below.

26 Having reviewed and considered the Application and supporting documents submitted in this
27 case, and pursuant to the power conferred on it under 28 U.S.C. § 1782 and its inherent authority, the
28 Court hereby ORDERS that AUSA Keough is appointed as Commissioner and is authorized to serve

[PROPOSED] ORDER
No. 25-mc-80172

1 Patreon with a subpoena in accordance with the terms and conditions contained in this Order, and to do
2 all else that may be necessary for the accomplishment of the purpose of this Order.

3 1. The Commissioner shall provide Patreon with a copy of this Order and the accompanying
4 Application documents.

5 2. The Commissioner shall serve a subpoena upon Patreon in substantially similar format to
6 the proposed subpoena attached as Exhibit 2 to the Declaration of Michael A. Keough, filed
7 concurrently with the Application. The subpoena shall be served by mail on Patreon's registered service
8 agent, with a courtesy copy sent via email to talcalan@patreon.com.

9 3. Patreon may provide a copy of the subpoena to the relevant account owner(s) and advise
10 them that Patreon will provide the information responsive to the subpoena, to the extent any such
11 information exists, unless the account owner(s) files with this Court, within 21 calendar days from the
12 date they receive the subpoena, a motion to quash.

13 4. Within 30 calendar days from receipt of the subpoena, provided that no motion to quash
14 is filed pursuant to Paragraphs 3 or 8 of this Order, Patreon shall provide the requested information,
15 along with a notarized verification signed under penalty of perjury, to the Commissioner by email at
16 michael.keough@usdoj.gov and to the following physical address:

17 Michael A. Keough
18 Assistant U.S. Attorney
U.S. Attorney's Office for the Northern District of California
1301 Clay Street, Suite 340S
19 Oakland, California 94612

20 5. The Commissioner may agree in writing and without additional Court order to provide
21 additional time to Patreon to provide the requested information. Further, the Commissioner may, in its
22 discretion, withdraw the subpoena. In the event the subpoena is withdrawn, Patreon shall not be
23 obligated to provide the requested information.

24 6. Nothing in Paragraphs 3 or 4 above shall require Patreon to disclose information that is
25 inconsistent with its obligations under the federal Stored Communications Act, 18 U.S.C. §§ 2701-2711.

26 7. This Order does not preclude the United States from filing an amended petition for a
27 further order authorizing an amended subpoena requesting additional information from Patreon in the
28 event the Romanian Court requests additional information from Patreon after reviewing Patreon's

1 response to the subpoena authorized by this Order.

2 8. This Order does not preclude Patreon from filing a motion to quash or modify the
3 subpoena.

4 IT IS SO ORDERED.

5 DATED: July 7, 2025

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